

COHEN & GREEN

March 4, 2025

Hon. Margo K. Brodie, U.S.D.J.
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn New York 11201

By Electronic Filing.

Re: Mercante v. Tarzia, 24-cv-08471

Dear Judge Brodie:

My firm, with co-counsel, represents Plaintiff in the case above. Per the Court's March 3, 2025 Minute Order, I write jointly with counsel for Defendant to propose a briefing schedule for Defendant's motion to dismiss and schedule for Plaintiff's amendment as of right.

The parties have agreed on the following:

- 3/28/2025: Defendant's Motion to dismiss to be served on Plaintiff;
- 4/18/2025: Plaintiff's amendment to be filed or opposition to be served on Defendant; and
- 5/9/2025: Defendant's reply to be served on Plaintiff or response to amended complaint (e.g., a pre-motion conference letter or answer) to be filed.

Because the Court follows a bundle rule (Individual Practice § 3(D)), on 5/10/2025, the parties propose filing the full bundle in the event the motion is fully briefed, and otherwise jointly proposing a briefing schedule if Plaintiff amends and Defendant still decides to file a motion to dismiss.

As always, the parties thank the Court for its time and consideration.

Respectfully submitted,

/s/

J. Remy Green

Honorific/Pronouns: Mx., they/their/them

COHEN & GREEN P.L.L.C.

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cc:

All relevant parties by electronic filing.